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*Attorney for Plaintiff Hydrafacial LLC*

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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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HYDRAFACIAL LLC, formerly known as  
EDGE SYSTEMS LLC,

Plaintiff,

v.

LUVU MEDICAL TECHNOLOGIES INC.,  
CLARION MEDICAL TECHNOLOGIES,  
INC., EUNSUNG GLOBAL CORP., and  
HEALTHCARE MARKETS, INC., doing  
business as POWERED BY MRP,

Defendants.

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**MOTION TO REOPEN CASE**

Case No. 2:24-cv-00587-TC

Judge: Hon. Tena Campbell

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Plaintiff HydraFacial LLC, formerly known as Edge Systems LLC (“Plaintiff”) moves to reopen this case as to Defendant Eunsung Global Corp. (“Eunsung”). On April 7, 2025, the Court signed the final consent judgment and permanent injunction against Defendants Luvo Medical Technologies, Inc.; Clarion Medical Technologies, Inc.; and Healthcare Markets, Inc. d/b/a Powered by MRP (the “Consent Judgment Defendants”) (the Plaintiff and Consent Judgment Defendants together referred to herein as the “Consent Judgment Parties”). *See* Dkt. 52. On the same date, the Court closed the case.

Eunsung is not a party to the final consent judgment and permanent injunction (Dkt. 52). Moreover, the Consent Judgment Parties explicitly noted in the consent judgment that “nothing contained in the Consent Judgment and Permanent Injunction shall affect any of HydraFacial’s rights against Eunsung Global Corp.” *Id.* at ¶ 12. Eunsung has not reached a settlement with Plaintiff and the final consent judgment and permanent injunction does not affect Plaintiff’s rights to pursue claims against Eunsung in this case. Thus, Plaintiff submits there is good cause to reopen this case as to Eunsung.

Dated: April 16, 2025

Respectfully submitted,

**PARR BROWN GEE & LOVELESS**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of April 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which sent notification of such filing to all counsel of record.

Andrea Foutz  
Legal Assistant